

## **Deficiency Progress Report - Update 1**

Report submitted: September 19, 2008

To complete the evaluation process, Cal/EPA requires the CUPAs to submit Deficiency Progress Reports that explain the CUPA's progress towards correcting the identified deficiencies. Deficiency Progress Reports are due every 90 days after the evaluation date until all deficiencies have been corrected.

**CUPA:** County of Riverside  
Department of Environmental Health  
Hazardous Materials Division

**Evaluation Date:** June 18 and 19, 2008

**Evaluators:** JoAnn Jaschke, CalEPA  
Fred Mehr, OES  
Terry Snyder, SWRCB

**Deficiencies corrected to date: #1, #3, and #5**

**Deficiency 2:** The CUPA permit does not include all the required UST specific elements. It is missing monitoring requirements of UST system elements including, tanks, sumps, dispensers, and piping.

**Preliminary Corrective Action(s):** By January 1, 2009, the CUPA will issue permits with all the specific monitoring requirements or attach an approved monitoring plan. (Please note there is a new Monitoring Plan Form D in Title 27).

**CUPA Corrective Action, (Update 1):** The Riverside County CUPA will attach a copy of the approved monitoring plan (UPCF UST-D) when issuing UST permits. This change in procedure is necessary due to the conversion of our database to Envision. The new procedure will be in place no later than January 1, 2009. As we proceed further with Envision, the feasibility of including this information directly on our permits will be evaluated.

**SWRCB Response:** The SWRCB considers this deficiency corrected.

**Deficiency 4:** The CUPA is exempting carbon dioxide without following the correct process for allowing the exemption.

**Preliminary Corrective Action(s):** By September 19, 2008, the CUPA shall submit an action plan outlining how the CUPA will correctly exempt or start regulating carbon dioxide over the threshold limits.

**CUPA Corrective Action, (Update 1):** The Riverside County CUPA has not exempted carbon dioxide and is not seeking a formal exemption at this time. Riverside County Ordinance 651.3 requires disclosure and a permit of any facility handling an amount equal to or greater than 200 cubic feet of gas at standard temperature and pressure. *“Food serving businesses handling more than 200 pounds of refrigerated bulk carbon dioxide gas used in the carbonation of beverages”* is a category incorporated into our *“Special Handler”* permit section of the ordinance. The industry standard for refrigerated carbon dioxide is recognized in pounds. According to the directive provided by OES, we are revising our ordinance to eliminate the reference to 200 pounds and reflect only the threshold of 200 cubic feet for compressed gasses at standard temperature and pressure. This revision, among others, has been submitted to County Counsel and will be presented to the Board of Supervisors for approval. Once this is completed, all staff will be familiarized with the revised ordinance and implementation will follow.

**OES Response:** The CUPA has corrected **deficiency 4**, no further updates are required.